



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

---

*610 Federal Plaza  
Central Islip, New York 11722*

November 15, 2022

By ECF

The Honorable Joan M. Azrack  
United States District Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: United States v. Jonathan Berretta, et al.  
Criminal Docket No. 20-029 (S-1)(JMA)

Dear Judge Azrack:

I write on behalf of the government in the above captioned matter, and with the consent of both defense counsel and their respective clients, to respectfully request an adjournment of the next status conference, which is presently set for November 21, 2022.

As the Court is aware, counsel for the remaining two defendants in this case – Jonathan Berretta and Maureen Serra – are actively engaged in plea negotiations with the government. Specifically, the government has received substantial mitigation submissions from both defendants, and is presently reviewing those submissions, as well as scheduling in-person meetings with counsel to further discuss the issues raised therein.

For the foregoing reasons, and in consultation with both defense counsel, it is respectfully proposed that the next status conference in this matter be held sometime in mid-January 2023, at which time the parties will be prepared to apprise the Court of the status of these negotiations. This additional time will permit the parties to continue, and hopefully complete, their discussions for a pretrial resolution of this case.

In light of the foregoing, the government respectfully requests the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in the interests of justice, until the selected mid-January date. I have conferred with counsel for both of the defendants, who have indicated that they, and their respective clients, have no objection to this request.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/ Justina L. Geraci  
Justina L. Geraci  
Assistant U.S. Attorney  
(631) 715-7835

cc: Michelle A. Gelernt, Esq.  
Daniel J. Ollen, Esq.